REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-6, 8-17, 19-28, and 30-34 are pending in this application, Claims 5, 6, 16, 17, 27, and 28 having been withdrawn, and Claims 1, 12, 23, and 34 having been amended by the present amendment. Support for amended Claims 1, 12, 23, and 34 can be found, for example, in the original claims, drawings, and specification as originally filed.[1] No new matter has been added.

In the outstanding Office Action, Claims 1-11 were rejected under 35 U.S.C. § 101; Claims 1, 12, 23, and 34 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee et al. (U.S. Patent No. 7,047,535; hereinafter "Lee") in view of Pace et al. (U.S. Patent No. 7,047,535, hereinafter "Pace") and further in view of Coveley et al. (U.S. Patent No. 6,873,620; hereinafter "Coveley"); Claims 2, 3, 13, 14, 24, and 25 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Pace and Coveley further in view Lam et al. (U.S. Patent No. 5,926,636; hereinafter "Lam"); Claims 4, 15, and 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Pace and Coveley further in view of Nakamura et al. (U.S. Patent No. 5,987,529; hereinafter "Nakamura"); and Claims 8-11, 19-22, and 30-33 were rejected under 35 U.S.C. § 103(a) as unpatentable over Lee in view of Pace, Coveley, and further in view of Hamilton et al. (U.S. Publication No. 2003/0177283; hereinafter "Hamilton").

Applicants acknowledge with appreciation the courtesy of Examiner Truong in discussing this case with Applicants' representative on June 17, 2008, during which time the 35 U.S.C. § 101 rejection in the outstanding Office Action was discussed. Applicants noted that page 2 of the outstanding Office Action appeared to incorrectly include Claims 23-33 in

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[1] See page 10, lines 12-19 of the specification and original Claim 7.

the 35 U.S.C. § 101 rejection. The Examiner agreed that Claims 23-33 were incorrectly

listed as rejected, and confirmed that only Claims 1-11 stand rejected under 35 U.S.C. § 101.

Further, Applicants respectfully request that the 2002-82806 reference cited in the

Information Disclosure Statement filed November 4, 2003 be acknowledged as having been

considered in the next Office Action.

In response to the rejection of Claims 1-11 under 35 U.S.C. § 101, Applicants have

amended Claim 1 to recite "[a]n image forming apparatus including hardware resources used

for image formation." Applicants respectfully submit that an image forming apparatus

including hardware resources is clearly an article of manufacture and is thus statutory.

Accordingly, Applicants respectfully request the rejection of Claims 1-11 under 35

U.S.C. § 101 be withdrawn.

In response to the rejections under 35 U.S.C. § 103(a), Applicants respectfully submit

that amended independent Claim 1 recites novel features clearly not disclosed or rendered

obvious by the applied references.

Amended independent Claim 1 is directed to an image forming apparatus including,

inter alia:

> ... hardware resources used for image formation, an
> application for performing processes on image formation, and a
> platform that exists between the application and the hardware
> resources, the platform including an operating system and at
> least one control service to control an execution of each
> requested process of the hardware resources according to a
> function call from the application, wherein interprocess
> communication is performed between the control service and
> the application, the image forming apparatus comprising:
>
> a virtual application service that is provided between the
> application and the platform, the virtual application service is
> configured to operate as a client process for the control service
> and to operate as a server process for the application, and
>
> a wrapping part configured to convert a function called
> by the application, and perform a function call to the control

service by using the converted function, wherein the wrapping
part is included in the virtual application service.

Independent Claims 12, 23, and 34 recite substantially similar features as Claim 1.

Thus, the arguments presented below with respect to Claim 1 are also applicable to

independent Claims 12, 23, and 34.

Page 3 of the outstanding Office Action, states that Lee at column 2, lines 10-16

describes "an application for performing processes on image formation and an [sic] control

service for performing system side processes according to a function call from the

application" Page 3 of the outstanding Office Action, also asserts that the client application

in Lee corresponds to Applicants' "application" and that the workflow engine corresponds to

Applicants' "control service."

However, Lee fails to teach or suggest "an application for performing processes on

image formation, and a platform that exists between the application and the hardware

resources, the platform including an operating system and at least one control service to

control an execution of each requested process of the hardware resources according to a

function call from the application, wherein interprocess communication is performed between

the control service and the application," as recited in Applicants' Claim 1.

Column 2, lines 8-16 of Lee describes that

> Current workflow programs provide an application
> program interface (API) for client applications to use to interact
> with the workflow engine and perform workflow related
> functions and operations. In prior art implementations where
> the API is implemented in Java, a Java Native Interface (JNI)
> wrapper is provided to translate the Java APIs to the native
> code of the workflow engine. The workflow engine then
> executes the native code to perform the function specified by
> the API.

Thus, Lee merely describes that an application program interface interacts with a

workflow engine and performs workflow related functions. Lee does not describe that a

platform exists between the client application and hardware resources. Further, assuming

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arguendo that <u>Lee</u>'s work engine corresponds to Applicants' control service, <u>Lee</u> does not describe a platform including an operating system and the workflow engine to *control an execution of each requested processing of the hardware resources according to a function call from the client application*, as required if <u>Lee</u> taught Applicants' claim features.
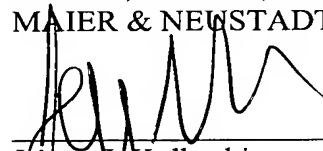
Thus, Applicants respectfully submit that amended independent Claims 1, 12, 23, and 34 (and all claims depending thereon) patentably distinguish over <u>Lee</u>. Further, Applicants respectfully submit that <u>Lam</u>, <u>Nakamura</u>, <u>Pace</u>, <u>Coveley</u>, and <u>Hamilton</u> fail to cure any of the above-noted deficiencies of <u>Lee</u>.

Accordingly, Applicants respectfully request the rejections under 35 U.S.C. § 103(a) be withdrawn.

Consequently, in view of the present amendment, and in light of the above discussion, the pending claims as presented herewith are believed to be in condition for formal allowance, and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.

James V. Kulbaski
Attorney of Record
Registration No. 34,648

Derek P. Benke
Registration No. 56,944

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 08/07)
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